



# County of San Diego

## DEPARTMENT OF PARKS AND RECREATION

RENÉE E. BAHL  
DIRECTOR

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November 30, 2007

Via Email: [Matthew.H.Shun@usace.army.mil](mailto:Matthew.H.Shun@usace.army.mil)

Matthew H. Shun  
Project Manager  
USACE - Los Angeles District  
915 Wilshire Blvd., Cube 15009  
Los Angeles, California 90017

Dear Mr. Shun:

The US Army Corps of Engineers has issued a Draft Final Site Inspection Report for the Former Brown Field Bombing Range (Report) dated October 15, 2007, which study area includes land within the Otay Ranch area in southern San Diego County.

The objective of the Report was to determine whether the site warrants further evaluation under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) beyond the Site Inspection (SI) stage. There is one designated Munitions Response Site (MRS) within the Brown Field Bombing Range; the Range Complex No. 1 MRS. The Range Complex No. 1 MRS contains two sub-ranges, the Bomb Target and the Aerial Rocket Range. Although the Report concludes that there is a potential that Munitions and Explosives of Concern (MEC) are located within this area and may pose a risk to humans, it indicates that immediate removal action is not warranted at this time.

We believe that immediate removal action is warranted at this time to enable the County to fulfill its habitat management, mitigation and grant obligations at the subject sites. Because of the risk to the health and safety of the consultants and County employees, no habitat management or public recreational activities can be conducted at the locations in Otay Ranch covered by the Report. The County has many ongoing efforts

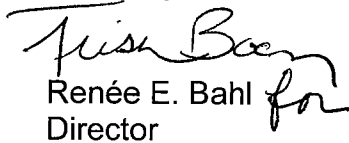


that will be negatively impacted if the U.S. Army Corps of Engineers does not expedite the remediation of the site including:

- Habitat management activities on land acquired by the County in Otay Ranch. The Multiple Species Conservation Program (MSCP) Plan adopted by the Board of Supervisors in 1997 and the Implementing Agreement entered into among the County, U.S. Fish and Wildlife Service and California Department of Fish and Game dated March 17, 1998, require the County to manage land to MSCP standards.
- Planning and construction of a segment of the Otay Valley Regional Park multi-use trail system. The County and City of San Diego, along with the City of Chula Vista have entered into a Joint Exercise of Powers Agreement to implement the Otay Valley Regional Park Concept Plan which spans the length of the Otay River.
- Vernal pool restoration activities on land owned by the City and the County of San Diego. In 2006, the City of San Diego received a TransNet Environmental Mitigation Program (EMP) grant (\$429,276) A portion of these funds (\$116,000) were to be used to restore vernal pools on County lands in the Otay Ranch.
- Habitat management activities at a vernal pool mitigation site pursuant to the Biological Opinion issued by the U.S. Fish and Wildlife Service. On April 16, 1996, the Board of Supervisors approved Major use Permit Modification P88-018W. The permit allowed the construction and operation of a multi-agency weapons training facility on a portion of the East Mesa Detention Facility property. A condition of this permit was the purchase and preservation of a parcel to replace a vernal pool complex permanently impacted as a result of project construction. On November 4, 1997, the Board approved the purchase of a 1.4-acre parcel at \$52,500 for this purpose.

In consideration of the foregoing concerns, we appreciate your support of our request to expedite the remediation of the former Brown Field Bombing Range site so that the County can move forward with its responsibilities while ensuring the health and safety of the public. If you have any questions, please do not hesitate to contact Trish Boaz, Chief – Resource Management Division, at 858-966-1370 or [trish.boaz@sdcounty.ca.gov](mailto:trish.boaz@sdcounty.ca.gov).

Sincerely,

  
Renée E. Bahl *for*  
Director

cc: Ms. Chandra Wallar, Deputy Chief Administrative Officer, Land Use and Environment Group

Mr. John C. Gaines, Director, Management Services Command, San Diego County Sheriff

Response to Comments to County of San Diego, Department of Parks and Recreation letter dated 30 November 2007. The letter was providing comments on the Draft-Final Site Inspection (SI) Report Dated 10/15/2007, for the former Brown field Bombing Range, J09CA113001, FUDS. The letter was sent by Renee E. Bahl. Response to comments provided by Lloyd E. Godard, FUDS Project Manager.

**County of SD Comment:**

The US Army Corps of Engineers has issued a Draft Final Site Inspection Report for the Former Brown Field Bombing Range (Report) dated October 15, 2007, which study area includes land within the Otay Ranch area in southern San Diego County.

The objective of the Report was to determine whether the site warrants further evaluation under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) beyond the Site Inspection (SI) stage. There is one designated Munitions Response Site (MRS) within the Brown Field Bombing Range; the Range Complex No. 1 MRS. The Range Complex No. 1 MRS contains two sub-ranges, the Bomb Target and the Aerial Rocket Range. Although the Report concludes that there is a potential that Munitions and Explosives of Concern (MEC) are located within this area and may pose a risk to humans, it indicates that immediate removal action is not warranted at this time.

We believe that immediate removal action is warranted at this time to enable the County to fulfill its habitat management, mitigation and grant obligations at the subject sites. Because of the risk to the health and safety of the consultants and County employees, no habitat management or public recreational activities can be conducted at the locations in Otay Ranch covered by the Report. The County has many ongoing efforts that will be negatively impacted if the U.S. Army Corps of Engineers does not expedite the remediation of the site including:

- Habitat management activities on land acquired by the County in Otay Ranch. The Multiple Species Conservation Program (MSCP) Plan adopted by the Board of Supervisors in 1997 and the Implementing Agreement entered into among the County, U.S. Fish and Wildlife Service and California Department of Fish and Game dated March 17, 1998, require the County to manage land to MSCP standards.
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In consideration of the foregoing concerns, we appreciate your support of our request to expedite the remediation of the former Brown Field Bombing Range site so that the County can move forward with its responsibilities while ensuring the health and safety of the public. If you have any questions, please do not hesitate to contact Trish Boaz, Chief - Resource Management Division, at 858-966-1370 or [trish.boaz@sdcounty.ca.gov](mailto:trish.boaz@sdcounty.ca.gov).

**USACE Response:**

We understand your safety concerns for this site and we will try to expedite the investigation and remediation of this site as much as we can. However, as explained at the last meeting, we may not have much funding to start the next phase of work until after 2010, when we complete the DOD mandate to perform a Site Inspection at all of our FUDS sites. Also, depending on how this site ranks compared with other site in our area (or across the nation), this site may not get funding until later.

Please keep us involved in your future planning meetings. We may be able to provide some assistance, if we are unable fund the next phase in the process. Please contact the FUDS Program Manger, Jeff Armentrout, for future request or notifications of meetings. He can be reached at (213) 452-3990, [jeffery.b.armentrout@usace.army.mil](mailto:jeffery.b.armentrout@usace.army.mil), or at US Army Corps of Engineers, Los Angeles District, 915 Wilshire Blvd. Los Angeles, California 90017.

**From:** [Patrick\\_Gower@fws.gov](mailto:Patrick_Gower@fws.gov)  
**To:** [Godard, Lloyd E SPL;](#)  
**CC:** [Maeve.Hanley@sdcounty.ca.gov](mailto:Maeve.Hanley@sdcounty.ca.gov); [Scott.McMillan@edaw.com](mailto:Scott.McMillan@edaw.com); [Kathleen\\_Brubaker@fws.gov](mailto:Kathleen_Brubaker@fws.gov); [Cara\\_McGary@fws.gov](mailto:Cara_McGary@fws.gov); [Susan\\_Wynn@fws.gov](mailto:Susan_Wynn@fws.gov);  
**Subject:** Comments on the Site Inspection Report Brown Field  
**Date:** Wednesday, November 21, 2007 9:29:46 AM  
**Attachments:**

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In Reply Refer To:  
81430-2008-B-0133/ 2008-TA-0127

Lloyd E. Godard  
FUDS Project Manager/RSC Design Integrator  
US Army Corps of Engineers,  
Los Angeles District, CESPL-PM-M

Dear Mr. Godard

The US Fish and Wildlife Service (Service) received the Draft-Final Site Inspection (SI) Report for the Brown Field Bombing Range on 29 Oct, 2007. We have reviewed the report and have some comments regarding the endangered species that have the potential to be found on-site and the potential impacts that may occur in the future if the project proceeds to the Remedial Investigation/ Feasibility Study (RI/FS) phase. This letter is a follow up on the items we discussed at the meeting on November 15, 2007 during which we addressed the comments listed below.

- The species list located on pgs 5-5 and 5-6 does not contain the San Diego Fairy Shrimp (*Branchinecta sandiegonensis*) or the California Gnatcatcher (*Polioptila californica californica*). These species can potentially occur on the project site and have been observed in the adjoining properties.
- Due to the sensitivity of the San Diego fairy shrimp to disturbance, it is important to minimize project impacts to the maximum extent feasible. We recommend a consultation under Section 7 of the Endangered Species Act be initiated before the RI/FS impacts occur.

If you have any questions please contact me at (760) 431-9440 ext 352.

Sincerely

Patrick Gower

Response to Comments to US Fish and Wildlife comments provide on E-mail dated 21 November 2007. The E-mail was providing comments on the Draft-Final Site Inspection (SI) Report Dated 10/15/2007, for the former Brown field Bombing Range, J09CA113001, FUDS. The Email was sent by Patrick Gower. Response to comments provided by Lloyd E. Godard, FUDS Project Manager.

**County of SD Comment:**

The US Fish and Wildlife Service (Service) received the Draft-Final Site Inspection (SI) Report for the Brown Field Bombing Range on 29 Oct, 2007. We have reviewed the report and have some comments regarding the endangered species that have the potential to be found on-site and the potential impacts that may occur in the future if the project proceeds to the Remedial Investigation/ Feasibility Study (RI/FS) phase. This letter is a follow up on the items we discussed at the meeting on November 15, 2007 during which we addressed the comments listed below.

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**USACE Response:**

Table 5.3 has been modified to include the Dan Diego Fairy Shrimp and the California Gnatcatcher.

**County of SD Comment:**

- Due to the sensitivity of the San Diego fairy shrimp to disturbance, it is important to minimize project impacts to the maximum extent feasible. We recommend a consultation under Section 7 of the Endangered Species Act be initiated before the RI/FS impacts occur.

**USACE Response:**

When the RI/FS phase is started, we will evaluate our effect on the known endangered species in the area and determine if formal consultation is necessary. However, we agree that if nothing changes between now and then, we will need to do some form of consultation prior to any field work. The text of the SI Report has been revised.